



Advocates for Workplace Fairness

February 16, 2024

Via ECF

The Honorable Robert W. Lehrburger
United States District Court for the
Southern District of New York,
500 Pearl Street,
New York, New York 10007-1312

Re: *Chen-Oster, et al. v. Goldman, Sachs & Co., et ano.*, No. 10 Civ. 6950
(AT) (RWL) (S.D.N.Y.)

Dear Judge Lehrburger:

We are co-counsel for the Plaintiffs and the Class in this action. We write to request that the Court issue a stay and relieve Outten & Golden LLP (“O&G”) of certain obligations under the operative Protective Orders (ECF Nos. 51 and 712) in this case.

O&G reasonably anticipates litigation (Matter A) related to one of the class members in this action and has instituted the required litigation hold. O&G does not believe it can comply with the Protective Orders, which require destruction of such information, without violating its preservation obligations in Matter A. Accordingly, we request that the Court (1) issue a stay allowing O&G sufficient time to segregate the relevant information, and (2) relieve the Firm of its obligations to destroy such information until such time as Matter A concludes.

Respectfully submitted,

/s/ Cara E. Greene

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Advocates for Workplace Fairness

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CERTIFICATE OF SERVICE

I hereby certify that on February 16, 2024, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system. Notice of this filing will be sent electronically to all registered parties by operation of the Court's electronic filing system.

/s/ Cara E. Greene

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